

NORTHERN DISTRICT

07 CV 7061
Judge Manning
Magistrate Judge Mason

CHRISTOPHER KNOX

PLAINTIFF PROSE

-VS-

(JH)

JURISDICTION

RECEIVED

Dec. 17, 2007

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MACEY HENRY; NEORA CHANDLER;

Lt. DAVID SAMBOLDMAN; Lt. MICHAEL GORMAN; MICHAEL W. DOBBINS
SGT. WICKS; Clo GILLETTE; Clo LIND BLOOM;

Clo HESS; Clo FORD; Clo KENNETH HAMILTON;

Lt. DAVID MITCHELL; OR. GNU; OR. MARVIN POWERS.

R/N MS. SCHAVE; R/N TERRY CALIPER; TERRY McCANN, ET AL.

DEFENDANTS

COMPLAINT FOR; INJUNCTION RELIEF,
DECLARATORY RELIEF, AND DAMAGES

NOW COME PLAINTIFF, CHRISTOPHER KNOX, PROSE, COMPLAIN
OF DEFENDANTS. MACEY HENRY, NEORA CHANDLER, Lt. GORMAN,
Lt. SAMBOLDMAN; SGT. WICKS, Clo GILLETTE, Clo LIND BLOOM, Clo HESS,
Clo FORD, Clo HAMILTON, Lt. MITCHELL, OR. GNU, OR. POWERS,
R/N MS. SCHAVE, R/N MS. CALIPER, AND McCANN. AND STATES AS
FOLLOWS

NATURE OF CASE

1. PLAINTIFF ALLEGES THAT; IN APRIL / 2006, PLAINTIFF
HAD INSERTED AN FOREIGN OBJECT INTO HIS URETHRA, DUE
TO PLAINTIFF SUFFERING FROM A MENTAL DISORDER OF
SELF-MUTILATION WHICH CAUSES PLAINTIFF CUT AND PUT
OBJECT'S INTO HIS PENIS (URETHRA)

2). PLAINTIFF ALLEGES THAT ; HE CONTESTED THE SURGICAL PROCEDURE AND PRACTICE THAT WERE GOING TO BE USED UPON PLAINTIFF TO REMOVE THE FOREIGN OBJECT FROM PLAINTIFF, URETHRA . . .

3). PLAINTIFF ALLEGES THAT ; DEFENDANTS, MS. HENRY, AND MS. CHANDLER, ORDER, THE DEFENDANTS, LT. SAMBODMAN AND LT. GORMAN, TO USE WHATEVER FORCE NECESSARY TO GAIN THE COMPLIANCE OF PLAINTIFF, TO CONSENT TO THE SURGICAL PROCEDURE AND PRACTICE . . .

4). PLAINTIFF ALLEGES THAT ; EXCESSIVE USE OF FORCE, WERE USED UPON PLAINTIFF, NOT FOR THE PURPOSE TO MAINTAIN DISCIPLINE, BUT FOR THE SOLE PURPOSES TO CAUSE HARM TO PLAINTIFF, AND TO INFECT PAIN AND SUFFERING UPON PLAINTIFF . . .

5). PLAINTIFF ALLEGES THAT ; A SURGICAL PROCEDURE AND PRACTICE WERE USED UPON PLAINTIFF WITHOUT ANY ANESTHESIA AND CONSENT OF PLAINTIFF, WHICH INFECTED SEVERE PAIN AND SUFFERING . . .

6). PLAINTIFF ALLEGES THAT ; ^{had} HE ~~W~~ THREE DISCIPLINARY REPORTS WERE WRITTEN ON PLAINTIFF IN RETALIATION FOR HIS UTILIZING THE GRIEVANCE PROCEDURE AND FOR COMPLAINING, TO OTHER PRISON'S OFFICIAL'S ABOUT THE APRIL 13 2006 INCIDENTS, AND DISCIPLINARY ACTION WERE TAKEN AGAINST PLAINTIFF, FOR UTILIZING THE GRIEVANCE PROCEDURE AND FOR COMPLAINING ABOUT THE APRIL 13, 2006 INCIDENTS, AND TO COVER-UP THE APRIL 13 2006 INCIDENTS, TO JUSTIFY IT . . .

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- PLAINTIFF, ALLEGES THAT; FOR THE ACTIONS AND INACTIONS OF ALL KNOWN AND UNKNOWN DEFENDANTS, PLAINTIFF, HAS BEEN SUBJECTED TO INFILCTION AND WILFUL PAIN AND SUFFERING, DUE TO (A). EXCESSIVE FORCE • (B) GENERAL OF MEDICAL CARE, DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS. (C). ~~RE~~ RETALIATORY CONDUCTS • • • (D). PROCEDURAL AND DUE PROCESS VIOLATIONS • • •

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- PLAINTIFF, ALLEGES THAT; FOR THE ACTIONS AND INACTIONS OF ALL KNOWN AND UNKNOWN DEFENDANTS, CONTINUING TO WILLFULLY VIOLATE PLAINTIFF CLEARLY ESTABLISHED, STATUTORY AND UNITED STATES CONSTITUTIONAL RIGHTS, THAT ARE SECURED UNDER THE FIRST, EIGHT, AND FOURTEENTH AMENDMENTS • • •

EXHAUSTION OF ADMINISTRATIVE REMEDIES

9) • PLAINTIFF HAS EXHAUSTED ALL AVAILABLE ADMINISTRATIVE REMEDY, BY FILING, GRIEVANCES, TO HIS COUNSELOR, THE GRIEVANCE-OFFICER, AND APPEALED TO A.R.B. WHICH WERE ALL DENIED • • • • •

JURISDICTION AND VENUE

10) • THIS ACTION IS BROUGHT PURSUANT TO SECTION 42 U.S.C. § 1983, UNDER THE FIRST, EIGHT, AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION. THEREFORE THIS COURT HAS THE JURISDICTION OVER THIS ACTION PURSUANT TO 28 U.S.C. §§ 1331 AND 1343 • • •

11) • DECLARATORY RELIEF, IS SOUGHT PURSUANT TO 28 U.S.C. §§ 2201 AND 2202 • VENUE IS PROPER IN THE NORTHERN DISTRICT OF ILLINOIS, UNDER 28 U.S.C. § 1331 (B). BECAUSE ONE OR MORE OF THE DEFENDANTS RESIDES IN THE DISTRICT, AND A SUBSTANTIAL PART OF THE EVENTS AND OMISSIONS GIVING RISE TO THE PLAINTIFF CLAIMS OCCURRED IN THE NORTHERN DISTRICT OF ILLINOIS • • •

LITIGATION HISTORY

12) • HAVE YOU EVER FILED A SUIT IN STATE OR FEDERAL COURT? YES.

13) • IF YOUR ANSWER TO QUESTION (12) IS YES, HOW MANY? 12 19

(1). KNOX - VS - PIERSON. 99-616. (2). KNOX - VS - PIERSON. 01-1467.
(3). KNOX - VS - PIERSON. 01-1316. (4). KNOX - VS - BYRANT. 02-4363.
(5). KNOX - VS - HAWKINS. 02-06499. (6). KNOX - VS - WAZNSCOTT. 03-1429.
(7). KNOX - VS - SPENCER. 03-1074. (8). KNOX - VS - CHARLTON. 03-1327.
(9). KNOX - VS - SCHOMIG. 03-1377. (10). KNOX - VS - COX. 05-1017.
(11). KNOX - VS - ROBERSON. 04-7765. (12). KNOX - VS - FOX. 06-5247.
(13). KNOX - VS - MICHELE. 06-0018. (14). KNOX - VS - WALKER. 07-1032.
(15). KNOX - VS - DR. POWERS. 07-508-WOS. (16). KNOX - VS - KAJTSA. 07-4855.
(17). KNOX - VS - IYLOH. 07-0814. (18). KNOX - VS - NAVARR. 07-50053.
(19). KNOX - VS - BENEFIELD. 07-795-JPG

PLAINTIFF

14) • CHRISTOPHER KNOX, IS CURRENTLY INCARCERATED IN THE ILLINOIS DEPARTMENT OF CORRECTIONS, IN TAMMS CORR. CENTER, IN (TAMMS) ILLINOIS

DEFENDANTS

15) • DEFENDANT, MARY HENRY, SERVED AS A ASSISTANT-WARDEN OF OPERATION, OF THE ILLINOIS DEPARTMENT OF CORRECTIONS, AND AS SUCH HAS THE ULTIMATE RESPONSIBILITIES FOR MAINTAINING THE OPERATION OF THE INSTITUTIONS AND INCLUDING DISCIPLINE, AND SECURITY. UPON INFORMATION AND BELIEF, DEFENDANT, MS. HENRY, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED, AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED DEFENDANT, MS. HENRY, IS SUED IN BOTH HER INDIVIDUAL AND OFFICIAL CAPACITIES

16) • DEFENDANT, NESSA CHANDLER, SERVED AS THE CHIEF ADMINISTRATIVE OFFICER, OF THE INSTITUTIONS, AND AS SUCH HAS THE ULTIMATE RESPONSIBILITIES FOR THE ENTIRE OPERATION OF THE INSTITUTION. INCLUDING IMPLEMENTING ALL STATE AND FEDERAL LAWS AND DEPARTMENT POLICIES, PRACTICES, AND PROCEDURE AFFECTING PRISONERS AT THE INSTITUTION. AND UPON INFORMATION AND BELIEF DEFENDANT MS. CHANDLER, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED, AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANT, MS. CHANDLER, IS SUED IN BOTH HER INDIVIDUAL AND OFFICIAL CAPACITIES

17) . DEFENDANTS, DAVID SAMBMAN, MICHAEL GORMAN, AND DAVID MITCHELL, SERVED AS CORRECTIONAL LIEUTENANTS OF THE ILLINOIS DEPARTMENT OF CORRECTIONS, AND AS SUCH HAS THE RESPONSIBILITIES OF THE SECURITY OF CORRECTIONAL CENTERS. AND UPON INFORMATION AND BELIEF, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANTS, SAMBMAN, GORMAN, MITCHELL, ARE SUED IN BOTH THEIR INDIVIDUAL'S AND OFFICIAL'S CAPACITIES

18) . DEFENDANT, WICKS, SERVED AS A CORRECTIONAL SERGEANT, OF THE ILLINOIS DEPARTMENT OF CORRECTIONS, AND AS SUCH HAS THE RESPONSIBILITIES OF THE SECURITY OF CORRECTIONAL CENTERS. AND UPON INFORMATION AND BELIEF, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANT, WICKS, IS SUED IN BOTH HIS INDIVIDUAL AND OFFICIAL CAPACITIES

19) . DEFENDANTS, CLO GILLETTE, CLO LINDBLOOM, CLO HESS, CLO FORD, CLO HAMILTON, SERVED AS CORRECTIONAL OFFICERS OF THE ILLINOIS DEPARTMENT OF CORRECTIONS. AND AS SUCH AS A RESPONSIBILITIES FOR SECURITY OF CORRECTIONAL CENTER'S. AND UPON INFORMATION AND BELIEF, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANTS, CLO GILLETTE, CLO LINDBLOOM, CLO HESS, CLO FORD, CLO HAMILTON, ARE SUED IN BOTH THEIR INDIVIDUAL'S AND OFFICIAL'S CAPACITIES .

20) • DEFENDANTS. DR. GNU. DR. POWERS, SERVED HAS MEDICAL DIRECTOR'S, FOR THE ILLINOIS DEPARTMENT OF CORRECTIONS, THEY OVERSEES THE HEALTH CARE UNIT IN THE INSTITUTIONS WHICH THEY IS RESPONSIBLE FOR PROVIDING MEDICAL AND MENTAL HEALTH SERVICES FOR PRISONERS AT THE INSTITUTIONS. AND CONDUCTING PSYCHOLOGICAL EVALUATIONS OF PRISONERS. AND UPON INFORMATION AND BELIEF, THEY HAVE FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANTS. DR. GNU, DR. POWERS, ARE BOTH SUED IN BOTH THEIR INDIVIDUAL'S AND OFFICIAL'S CAPACITIES • • •

21) • DEFENDANT, TERRY CALIPER, SERVED AS A HEALTH CARE UNIT ADMINISTRATOR, FOR THE ILLINOIS DEPARTMENT OF CORRECTIONS. AND IS RESPONSIBLE TO ENSURE THAT HEALTH CARE SERVICES INCLUDING MEDICAL, DENTAL, AND PSYCHOLOGICAL SERVICES ARE DELIVERED TO THE INMATE POPULATION IN A WAY THAT IS COMMENSURATE WITH THE SERVICES OFFERED IN THE FREE COMMUNITY. AND UPON INFORMATION AND BELIEF. SHE HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANT. MS. CALIPER IS SUED IN BOTH HER INDIVIDUAL AND OFFICIAL CAPACITIES.

22) • DEFENDANT, MS. SCHAVE, ■ SERVED AS A NURSE, FOR THE ILLINOIS DEPARTMENT OF CORRECTIONS. AND AS SUCH HAS THE RESPONSIBILITIES OF PROVIDING MEDICAL SERVICES TO PRISONERS. AND UPON INFORMATION AND BELIEF, SHE HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED

AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED.
DEFENDANT, MS. SCHAVE, IS SUED IN BOTH HER —
INDIVIDUAL AND OFFICIAL CAPACITIES . . .

23) . UPON INFORMATION AND BELIEF, ALL UNKNOWN —
DEFENDANTS, SERVED AS EMPLOYEES OF THE ILLINOIS
DEPARTMENT OFT CORRECTIONS, AND HAD THE RESPONSIBILITY
TO PERFORM THEIR INDIVIDUALS AND OFFICIAL DUTIES.
AND HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED.
AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED.
ALL UNKNOWN DEFENDANTS, ARE SUED IN BOTH THEIR
INDIVIDUAL'S AND OFFICIAL'S CAPACITIES . . .

EXCESSIVE USE OF FORCE

24). PLAINTIFF ALLEGES THAT; HE SUFFERS FROM A SELF-MUTILATION DISORDER; WHICH CAUSES PLAINTIFF, TO CUT ON HIMSELF, AND TO INSERT FOREIGN OBJECTS INTO HIS PENIS

25). PLAINTIFF ALLEGES THAT; ON OR ABOUT APRIL 1 2006, PLAINTIFF HAD INSERTED AN OBJECT INTO HIS PENIS. IN WHICH X-RAYS SHOWED THAT PLAINTIFF DID HAVE A FOREIGN OBJECT STUCK INTO HIS PENIS.

26). PLAINTIFF ALLEGES THAT; ON OR ABOUT APRIL 13 2006, DEFENDANTS NEDRA CHANDLER, MARKEY HENRY, AND DR. GNU, CALL PLAINTIFF TO THE HEALTH CARE UNIT, TO TALK ABOUT THE OBJECT STUCK IN PLAINTIFF PENIS

27). PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, ASK PLAINTIFF, DID HE WANT HIM TO REMOVE THE OBJECT? WHICH PLAINTIFF AT THAT TIME HAD STATED YES

28). PLAINTIFF ALLEGES THAT; HE ASK DEFENDANT, DR. GNU, HOW HE WERE PLANNING ON REMOVING THIS FOREIGN OBJECT FROM MY PENIS? AND IS A SURGICAL PROCEDURE GOING TO BE PERFORMED? IF SO HOW WERE IT GOING TO BE PERFORMED?

29). PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, TOLD PLAINTIFF, THAT A BASIC SURGICAL PROCEDURE WERE GOING TO BE PERFORMED, WITHOUT ANY ANESTHESIA, AND THAT THE PROCEDURE WOULD TAKE APPROXIMATELY THREE - FOUR HOURS TO COMPLETE

30). PLAINTIFF ALLEGES THAT; HE ASK DEFENDANT, DR. GNU, WHAT KIND OF SURGICAL EQUIPMENT WERE GOING TO BE UTILIZED DURING THIS SURGICAL PROCEDURE? DEFENDANT, DR. GNU, SHOWED PLAINTIFF, AND TOOK OUT TWO TOOLS THAT WERE APPROXIMATELY 10 - 15 INCHES LONG WITH SHARP POINTS. PLAINTIFF, THEN ASK DEFENDANT, DR. GNU, "IS ^{HE} A CERTIFIED UROLOGIST? AND LICENSED TO PERFORM A SURGICAL PROCEDURE AS A UROLOGIST?" HE CLEARLY "STATED" "NO" . . .

31). PLAINTIFF ALLEGES THAT; HE IMMEDIATELY CONTESTED THE SURGICAL PROCEDURE, DEFENDANT, DR. GNU, WERE GOING TO PERFORM ON PLAINTIFF, DEFENDANT, DR. GNU, TOLD PLAINTIFF, TO EXPLAIN ~~IT~~ = MENT. PLAINTIFF FLAT OUT TOLD DEFENDANT, DR. GNU, "I AM NOT CONSENTING TO YOU TO PERFORM A SURGICAL PROCEDURE ON ME AND YOU CANNOT PERFORM such a SURGICAL, BECAUSE YOU ARE NOT CERTIFIED AS A UROLOGIST" .

32). PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, THEN TOLD PLAINTIFF, "YOU ARE GOING TO LET ME TAKE IT OUT ONE WAY NOR OTHER, AS IF ~~IT~~ = HAD NO CHOICE IN ACCEPTING MEDICAL TREATMENT OR DENYING IT" .

33). PLAINTIFF ALLEGES THAT; DEFENDANTS, HENRY, AND CHANDLER, ASK PLAINTIFF, "ARE YOU REFUSING TO LET HIM DO THE SURGICAL PROCEDURE, TO REMOVE THE OBJECT?" PLAINTIFF STATED YES . . .

34). PLAINTIFF ALLEGES THAT; WHILE IN THE EMERGENCY ROOM, HE WAS SECURED IN A WAIST-BELT, HANDCUFFS, AND LEG IRONS, THE WHOLE TIME WHILE IN THE HEALTH CARE UNIT, AND WHEN I WAS TRANSPORTED BACK TO HIS LIVING UNIT . . .

35). PLAINTIFF ALLEGES THAT; WHILE HE WERE SITTING THE TABLE IN THE EMERGENCY ROOM, DEFENDANTS, (LT. GORMAN, LT. SAMBDMAN,) (SGT. WICKS,) (CLO GILLETTE,) (CLO LINDBLOOM,) (CLO HESS,) AND SEVERAL OTHER UNIDENTIFIED CORRECTIONAL OFFICER'S CAME INTO THE EMERGENCY ROOM, WHERE PLAINTIFF WERE AT * * * *

36). PLAINTIFF ALLEGES THAT; DEFENDANTS, HENRY, CHANDLER, AND DR. GNU, ASK PLAINTIFF, IS HE GOING TO CONSENT TO THE SURGY TO GET THE OBJECT FROM PENIS? AGAIN PLAINTIFF, CONTESTED THE PROCEDURE AND PRACTICE OF THE SURGY * * *

37). PLAINTIFF ALLEGES THAT; DEFENDANTS, HENRY, AND CHANDLER, TOLD DEFENDANTS, LT. GORMAN, AND LT. SAMBDMAN, TO USE WHATEVER FORCE NECESSARY TO GET HIM TO COMPLY WITH THE SURGY. PLAINTIFF, YELLED OUT I HAVE A RIGHT TO REFUSE MEDICAL TREATMENT AND/OR SERVICES.

38). PLAINTIFF ALLEGES THAT; DEFENDANTS, SGT. WICKS, CLO HESS, CLO GILLETTE, CLO LINDBLOOM, AND SEVERAL UNIDENTIFIED OFFICER'S, STARTED PICKING PLAINTIFF UP, TO REMOVE HIS CLOTHING, AND WHEN PLAINTIFF YELLED OUT LOUD TO STOP, THAT'S WHEN DEFENDANTS, SGT. WICKS, CLO GILLETTE, BOTH STARTED HITTING PLAINTIFF, AND KNOCKING PLAINTIFF TO THE FLOOR * *

39). PLAINTIFF ALLEGES THAT; WHILE ON THE FLOOR OF THE EMERGENCY ROOM, DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, SGT. WICKS, CLO HESS, CLO GILLETTE, CLO LINDBLOOM, AND SEVERAL UNIDENTIFIED OFFICER'S ALL STARTED STOMPING, KICKING, AND HITTING PLAINTIFF, WHILE ON THE EMERGENCY ROOM FLOOR. SECURED IT RESTRAINTS * * *

40). PLAINTIFF ALLEGES THAT; THIS BEATING WENT ON FOR APPROXIMATELY 3-5 MINUTES, AND THAT'S WHEN DEFENDANTS, HENRY, AND CHANDLER, ASK PLAINTIFF, IS HE GOING TO ALLOW THE SURGY TO BE PERFORMED? AGAIN PLAINTIFF, CONTESTED THE PROCEDURE AND PRACTICE OF THE SURGY TO BE PERFORMED. DEFENDANTS, HENRY, AND CHANDLER, AGAIN INSTRUCTED DEFENDANTS, LT. GORMAN, AND LT. SAMBDMAN, TO DO WHAT THEY GOT TO DO

41). PLAINTIFF, ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, ORDERED, DEFENDANTS, CLO GILLETTE, CLO HESS, CLO LINDBLOOM, SGT. WICKS, AND SEVERAL UNIDENTIFIED OFFICER'S TO PICK ME UP AND PUT ME ON THE TABLE. THE DEFENDANTS, CLO GILLETTE, CLO HESS, CLO LINDBLOOM, SGT. WICKS, AND SEVERAL UNIDENTIFIED OFFICER'S PICKED PLAINTIFF UP OVER THEIR HEAD'S AND FORCIBLY SLAMMED PLAINTIFF ONTO HIS BACK OF THE EMERGENCY TABLE

42). PLAINTIFF, ALLEGES THAT; DEFENDANTS, CLO HESS, CLO GILLETTE, CLO LINDBLOOM, AND SGT. WICKS, ALL STARTED HITTING PLAINTIFF IN HIS BODY AREA AND FACE, WHILE LT. GORMAN AND LT. SAMBDMAN REPEATEDLY CHOKED PLAINTIFF UNTIL PLAINTIFF WENT UNCONSCIOUS.

43). PLAINTIFF, ALLEGES THAT; WHEN GAIN CONSCIOUS BACK, HIS JUMPSUIT WERE DOWN TO HIS ANKLES. PLAINTIFF, ALLEGES THAT; DEFENDANT, DR. GNU, AND AN UNIDENTIFIED FEMALE DOCTOR WERE ABOUT TO PERFORM A SURGY WITHOUT PLAINTIFF CONSENT

44). PLAINTIFF, ALLEGES THAT; DEFENDANT, DR. GNU, STUCK A 10-15" INCHES SURGICAL TOOL INTO PLAINTIFF, PENIS; DEFENDANT, DR. GNU, JAMMED THIS SURGICAL TOOL AROUND IN PLAINTIFF PENIS FOR APPROXIMATELY 1 1/2 TO 2 HOURS, WITHOUT ANY ANESTHESIA. • • •

45). PLAINTIFF, ALLEGES THAT; HE PLEADED FOR DEFENDANT, DR. GNU, TO STOP, BUT HE INSISTED ON PERFORMING THE SURGICAL PROCEDURE AND PRACTICE ON PLAINTIFF, FINALLY DEFENDANT, DR. GNU STOPPED AFTER REALIZING PLAINTIFF PENIS WAS BLEEDING, AND HIS ATTEMPT'S WERE GOING TO BE UNSUCCESSFUL. • • •

46). PLAINTIFF, ALLEGES THAT; DEFENDANT, DR. GNU, TOLD DEFENDANTS, HENRY, AND CHANDLER, THAT HE WON'T BE ABLE TO REMOVE THE FOREIGN OBJECT FROM PLAINTIFF, PENIS, AND STATED THAT HE WAS DONE WITH ME. • • •

47). PLAINTIFF, ALLEGES THAT; DEFENDANTS, HENRY, AND CHANDLER, TOLD DEFENDANTS, LT. GORMAN, AND LT. SAMBDMAN, TO TAKE PLAINTIFF, BACK TO HIS LIVING UNIT. • • •

48). PLAINTIFF, ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, SGT. WICKS, CLO GILLETTE, CLO LINDBLOOM, CLO HESS, AND SEVERAL UNIDENTIFIED CORRECTIONAL OFFICER'S TRANSPORTED PLAINTIFF BACK TO HIS LIVING UNIT. • • • IN A TRANSPORTATION VAN. •

49). PLAINTIFF ALLEGES THAT; AS HE WERE LEAVING THE HEALTH CARE UNIT DEFENDANT, LT. SAMBDMAN, SLAMMED A PLEXI-GLASS SHIELD INTO PLAINTIFF FACE AREA REPEATEDLY, ALMOST KNOCKING PLAINTIFF DOWN THE STAIRS

50). PLAINTIFF ALLEGES THAT; WHILE HE WERE IN THE TRANSPORTATION VAN, BEING TRANSPORTED BACK TO HIS LIVING UNIT, DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, C/O GILLETTE, C/O LINDLOOM, C/O HESS, AND SGT. WICKS, ALL STARTED HITTING AND KICKING ON PLAINTIFF, WHILE ON THE VAN FLOOR

51). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN STARTED CHOKING PLAINTIFF, REPEATEDLY UNTIL PLAINTIFF, WHO WENT UNCONSCIOUS AND DEFECATED ONTO HISSELF

52). PLAINTIFF ALLEGES THAT; WHEN HE ARRIVED AT HIS LIVING UNIT DEFENDANTS, C/O GILLETTE, C/O LINDLOOM, C/O HESS, SGT. WICKS, AND SEVERAL UNIDENTIFIED OFFICER'S, HAD TO CARRY PLAINTIFF TO HIS LIVING UNIT AND CELL LOCATION

53). PLAINTIFF ALLEGES THAT; WHILE BEING CARRIED BY THE DEFENDANTS, DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, REPEATEDLY HIT PLAINTIFF IN HIS FACE AND HEAD

54). PLAINTIFF ALLEGES THAT; HE WAS TAKEN TO HIS CELL. THE RESTRAINTS WERE REMOVED FROM PLAINTIFF, BUT DEFENDANT, LT. GORMAN, HANDCUFFED PLAINTIFF TO HIS CELL DOOR, BACKWARD, AND THE PLAINTIFF, REMAINED THAT WAY FROM SEVERAL HOURS. NAKED

55). PLAINTIFF ALLEGES THAT; DEFENDANTS, HENRY, AND CHANDLER, AND DR. GNU, ALL STOOD THERE AND WATCHED THE DEFENDANTS, REPEATEDLY STOMP, KICK, CHOKES, AND SLAME, PLAINTIFF WHILE IN THE HEALTH CARE UNIT EMERGENCY ROOM . . .

56). PLAINTIFF, ALLEGES THAT; DEFENDANTS HENRY, CHANDLER, AND DR. GNU, FAILED AND REFUSED TO INTERVENE IN THE EXCESSIVE USE FORCE BEING USED ON PLAINTIFF, AND ORDERING DEFENDANTS TO USE WHATEVER FORCE NECESSARY TO GET PLAINTIFF TO COMPLY . . .

57). PLAINTIFF, ALLEGES THAT; DEFENDANTS, HENRY, CHANDLER, LT. GORMAN, LT. SAMBOLMAN, C/O GILLETTE, C/O LINDBLOOM, C/O HESS, AND SEVERAL UNIDENTIFIED, CORRECTIONAL OFFICER'S, STOOD AND WATCHED DEFENDANT DR. GNU, AND AN UNIDENTIFIED FEMALE DOCTOR, USE EXCESSIVE USE OF FORCE UPON PLAINTIFF BY STICKING AN SURGICAL TOOL INTO PLAINTIFF PANTS, REPEATEDLY. AND FAILING AND REFUSING TO INTERVENE . . .

58). PLAINTIFF, ALLEGES THAT; SEVERAL UNIDENTIFIED CORRECTIONAL OFFICER'S, DRESSED IN FULL PROTECTIVE GEAR APPROACHED PLAINTIFF CELL FRONT ARMED WITH; PLEXIGLASS SHIELD; A BATON; AND CHEMICAL AGENTS . . .

59). PLAINTIFF, ALLEGES THAT; THE UNIDENTIFIED CORRECTIONAL OFFICER'S, ESCORTED PLAINTIFF TO ANOTHER CELL, THAT HAD MACE A.K.A. (PEPPER MACE) ALL OVER THE WALLS, BED, AND FLOOR, DUE TO AN INMATE BEING SPRAYED WITH CHEMICAL AGENTS, ON THE DATE IN QUESTIONS .

(60). PLAINTIFF ALLEGES THAT; ONE OF THE UNIDENTIFIED CELL EXTRACTION TEAM MEMBER, WHILE PLAINTIFF, WERE LYING DOWN ON THE BED, ON HIS STOMACH IN RESTRAINTS, SPANDED PLAINTIFF BUTTOCKS, WHILE THE OTHER OFFICER, USED A VIDEO CAMERA TO LOOK INTO AND AT PLAINTIFF RETECUM . . .

(61). PLAINTIFF ALLEGES THAT; THE UNIDENTIFIED CELL EXTRACTION TEAM MEMBERS, WHILE PLAINTIFF, WERE LYING DOWN ON THE BED, ON HIS STOMACH IN RESTRAINTS, FORCIBLY, BENT PLAINTIFF LEG'S IN AN UPWARD LIKE POSITION, AS IF THEY WERE TRYING TO HOLD THE PLAINTIFF LEG TO THE HANDCUFF'S BEHIND HIS BACK . . .

(62). PLAINTIFF ALLEGES THAT; DEFENDANTS CLO FORD, R/N SCHAUER, AND SEVERAL OTHER UNIDENTIFIED PRISON-OFFICIAL'S, STOOD THERE AND ALLOW THE CELL EXTRACTION TEAM MEMBER'S, TO BEND PLAINTIFF LEG'S TOWARDS HIS BACK AREA, AND FAILED AND REFUSED TO INTERVENE IN SUCH EXCESSIVE USE OF FORCE

(63). PLAINTIFF ALLEGES THAT; THIS ACTION IS AGAINST ALL KNOWN AND UNKNOWN DEFENDANTS, WHO WERE PERSONALLY INVOLVED OR HAD THE OPPORTUNITY TO INTERVENE AND FAILED AND REFUSED TO DO SO ARE RESPONSIBLE FOR DAMAGES .

(64). PLAINTIFF ALLEGES THAT; FOR THE ACTION AND INACTION DESCRIBED ABOVE, THE DEFENDANTS HAS USED UNJUSTIFIABLE USE OF FORCE UPON PLAINTIFF, AND IN DOING SO, FAILED AND REFUSED TO INTERVENE IN SUCH FORCE. SO THUS, THEREFORE THE DEFENDANTS ACTED IN BAD-FAITH IN THE PERFORMANCE OF THEIR INDIVIDUAL AND OFFICIAL CAPACITIES. IN VIOLATION OF THE " EIGHT" AMENDMENT . . .

DELIBERATE INDIFFERENCE TO PLAINTIFF
SERIOUS MEDICAL NEEDS . . .

(65). PLAINTIFF, ALLEGES THAT ; HE SUSTAINED SEVERAL INJURIES AS AN RESULT OF "EXCESSIVE USE OF FORCE." AND FOR FAILURE TO PROVIDE MEDICAL TREATMENT AND/OR SERVICES, OR AN UROLOGIST TO HAVE FOREIGN OBJECT REMOVED

(A). MIGRAINE HEADACHES. (B) DIZZY SPELLS. (C). UPPER AND LOWER BACK INJURIES. (D). CUTS AND BRUSSES ON ANKLES AND WRISTS
(E). BUSTY LIP. (F). BRUSES ON RIBS-CAGES. (G). SWOLLEN JAW.
(H). SMALL CONCUSSION ON BACK OF THE HEAD. (I). SWELLING IN PENIS.
(J). DIFFICULTIES URINATING. (K). BURNING WHEN URINATING
(L). GREENISH LIKE SUBSTANCE DISCHARGING FROM PENIS
(M). BLOOD IN URINE . . . (N). INCORPORABLE INJURY
(O). BLADDER, SWELLING AND PAIN . . . (P). INJURED KNEES

(66). PLAINTIFF, ALLEGES THAT ; HE REQUESTED MEDICAL TREATMENT AND/OR SERVICES, TO THE DEFENDANTS, ; HENRY, CHANDLER, LT. GORMAN, LT. SAMBDMAN, SGT. WICKS, C/O GILLETTE, C/O LINODLOOM, C/O HESS, DR. GUN, DR. POWERS, C/O FORD, R/H SCHAVE, R/H CRIPER. AND ALL KNOWN AND UNKNOWN, PRISON-MEDICAL AND SECURITY PERSONNEL'S FOR THE ABOVE INJURIES

(67). PLAINTIFF, ALLEGES THAT ; HE REPEATEDLY REQUESTED FOR MEDICAL TREATMENT AND/OR SERVICES, TO THE ABOVE NAMED DEFENDANTS, AND UNKNOWN DEFENDANTS, WHICH THEY ALL ONLY DO ILL-WELL TOWARDS PLAINTIFF COMPLAINTS, FOR MEDICAL TREATMENT AND/OR SERVICES

(8). PLAINTIFF ALLEGES THAT; ALL KNOWN AND UNKNOWN DEFENDANTS, IN PARAGRAPH # 66.; FAILED AND HAS REFUSED TO PROVIDE PLAINTIFF, ANY MEDICAL TREATMENT AND/OR SERVICES, FOR THE INJURIES PLAINTIFF SUSTAINED, FROM THE USE OF EXCESSIVE FORCE.

(9). PLAINTIFF ALLEGES THAT; DEFENDANTS, DRs. POWERS, GNU, HAS INTENTIONALLY LEFT THE FOREIGN OBJECT STUCK INSIDE THE PLAINTIFF, URETHRA FROM APRIL /2006 - DECEMBER /2006. WHICH PLAINTIFF, HAS DIFFICULTIES URINATING, DUE TO OBJECT BLOCKING-UP THE URETHRA . . .

(10). PLAINTIFF ALLEGES THAT; HE COMPLAINED TO DEFENDANTS, DR. POWERS, DR. GNU, AND R/N CATHETER, THAT PLAINTIFF IS HAVING DIFFICULTIES URINATING, AND THAT A EXTREME BURNING SENSATION AND PAIN COMES UPON PLAINTIFF, WHENEVER I URINATE . . .

(11). PLAINTIFF ALLEGES THAT; HE COMPLAINED TO DEFENDANTS, DR. POWERS, DR. GNU, R/N CATHETER, AND ALL KNOWN AND UNKNOWN DEFENDANTS, THAT BLOOD AND A GREENISH LIKE SUBSTANCE DISCHARGES FROM PLAINTIFF, WHENEVER I URINATE . . .

(12). PLAINTIFF ALLEGES THAT; DEFENDANTS, WHETHER KNOWN OR UNKNOWN, PREVENTED PLAINTIFF, FROM PARTICIPATING IN HIS DAILY ACTIVITIES, BY FAILING AND REFUSING TO PROVIDE PLAINTIFF MEDICAL TREATMENT AND/OR SERVICES . . .

73). PLAINTIFF, ALLEGES THAT; ALL DEFENDANTS WHETHER KNOWN OR UNKNOWN, CAUSED PLAINTIFF TO BE SUBJECT TO INFILTRATION OF PAIN AND SUFFERING, BY KNOWINGLY, INTENTIONALLY, RECKLESSLY AND MALICIOUSLY, SADISTICALLY DEPRIVED PLAINTIFF, MEDICAL TREATMENT AND/OR SERVICES . . .

74). PLAINTIFF, ALLEGES THAT; FOR THE ACTION OR INACTION OF ALL KNOWN AND UNKNOWN DEFENDANTS, FAILURE AND REFUSAL TO PROVIDE PLAINTIFF, MEDICAL TREATMENT AND/OR SERVICES, AND THE CONTINUANCES AND WILLFULLY DEPRIVING PLAINTIFF MEDICAL TREATMENT, CONSTITUTES DELIBERATE INDIFFERENCE TO PLAINTIFF SERIOUS MEDICAL NEEDS . . .

75). PLAINTIFF, ALLEGES THAT; THIS COMPLAINT IS ALSO FILED AGAINST ALL UNKNOWN PRISON MEDICAL AND SECURITY PERSONNEL'S WHO ALSO DENIED PLAINTIFF, MEDICAL TREATMENT AND/OR SERVICES, OR HAS FAILED AND HAS REFUSED TO INTERVENE IN SUCH DENIAL OF MEDICAL TREATMENT AND/OR SERVICES . . .

76). PLAINTIFF, ALLEGES THAT; FOR THE ACTION OR INACTION OF ALL UNKNOWN DEFENDANTS FAILURE AND REFUSAL TO PROVIDE PLAINTIFF MEDICAL TREATMENT AND/OR SERVICES, AND THEIR CONTINUANCES TO DEPRIVE PLAINTIFF, MEDICAL TREATMENT AND/OR SERVICES, CONSTITUTES, DELIBERATE INDIFFERENCE TO PLAINTIFF SERIOUS MEDICAL NEEDS, IN VIOLATION OF THE "EIGHT" AMENDMENT . . .

PROCEDURAL AND DUE PROCESS VIOLATIONS

77). PLAINTIFF ALLEGES THAT ; DEFENDANTS, LT. GORMAN, C/O FORD, LT. SAMBOLMAN, FALSELY ACCUSED PLAINTIFF OF VIOLATION OF DEPARTMENT RULES, IN RETALIATION FOR UTILIZING THE GRIEVANCE PROCEDURE, AND FOR COMPLAINING ABOUT THE EXCESSIVE USE OF FORCE, AND TO COVER-UP THE EXCESSIVE FORCE INCIDENTS. • •

78). PLAINTIFF ALLEGES THAT ; DEFENDANTS IN PARA GRAPH # — ON OR ABOUT APRIL 13 2006, CHARGED PLAINTIFF WITH WITH SERIOUS RULE VIOLATIONS IN RETALIATION, FOR PLAINTIFF — EXERCISING HIS PROTECTIVE CONSTITUTIONAL RIGHTS. • • •

79). PLAINTIFF ALLEGES THAT ; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, AND McCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF, WITH A 24-HOURS NOTICE.

80). PLAINTIFF ALLEGES THAT ; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, McCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF, WITH AN OPPORTUNITY TO CALL WITNESSES ON HIS BEHALF. • • •

81). PLAINTIFF ALLEGES THAT ; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, McCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF, WITH AN OPPORTUNITY TO PRESENT DOCUMENTATION IN MY DEFENSE. • • •

82). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, CLO HAMILTON, McCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF, THEIR REASONS FOR THEIR FINDING AND THE EVIDENCE RELIED UPON

83). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, CLO HAMILTON, McCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF WITH STAFF-ASSISTANCE, IN THE PREPARATION AND PRESENTATION OF PLAINTIFF DEFENSE

84). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, CLO HAMILTON, McCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO SERVE PLAINTIFF A COPY OF DISCIPLINARY REPORTS, WITHIN THE "EIGHT" DAYS TIME FROM

85). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, CLO HAMILTON, McCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF A COPY OF THE ADJUSTMENT COMMITTEE SUMMARY'S.

86). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, CLO HAMILTON, McCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF AN IMPARTIAL FACT-FINDER, BY NOT ALLOWING SOMEONE REPRESENTING A COUNSELOR STAFF, ON THE COMMITTEE

87). PLAINTIFF ALLEGES THAT; ALL KNOWN AND UNKNOWN DEFENDANTS HAS VIOLATED PLAINTIFF RIGHTS BY FINDING HIM GUILTY OF ALL CHARGES, IN RETALIATION FOR HIS EXERCISING CONSTITUTIONAL RIGHTS, AND IMPOSING DISCIPLINARY ACTION, FOR EXERCISING HIS PROTECTOR RIGHTS. IN VIOLATION OF THE FIRST AND FOURTEENTH AMEND.

RETALIATION FOR EXERCISING HIS
CONSTITUTIONAL PROTECTED RIGHTS

88). PLAINTIFF ALLEGES THAT; HE BEGAN TO COMPLAINING ABOUT THE EXCESSIVE USE FORCE, THAT WERE USED UPON PLAINTIFF TO OTHER PRISON OFFICIAL'S, AND FILING GRIEVANCE REGARDING THE INCIDENTS THAT OCCURRED ON OR ABOUT APRIL 13 2006. . . .

89). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBUDMAN, CLO FORD, NOTICED THAT PLAINTIFF HAD SUBMITTED SEVERAL WRITTEN GRIEVANCE'S TO HIS COUNSELOR, RELATING TO THE APRIL 13 2006 INCIDENTS. BY PLACING THOSE GRIEVANCE'S IN THE MAIL BAG, WHICH IS LOCATED ON THE WING PLAINTIFF WERE ASSIGNED TO.

90). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBUDMAN, ALL CAME TO PLAINTIFF AND TOLD PLAINTIFF, TO RECONSIDER IN FILING THOSE GRIEVANCE'S, AND THAT THEY'LL CONSIDER NOT WRITING PLAINTIFF A DISCIPLINARY REPORT. . . .

91). PLAINTIFF ALLEGES THAT; HE TOLD DEFENDANTS, LT. SAMBUDMAN, LT. GORMAN, CLO FORD; I HAVE NT DOIN SHIT, FOR YOU TO WRITE ME A DISCIPLINARY REPORT. . . .

92). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBUDMAN, AND CLO FORD, TOLD PLAINTIFF, THEY COULD COME UP WITH SOMETHING TO WRITE PLAINTIFF UP FOR. THE DEFENDANT CLO FORD, STATED I CAN TELL A STORY VERY WELL. (IN OTHER WORD'S HE CAN TELL A GOOD LIE ON PRISONERS)

93). PLAINTIFF ALLEGES THAT; HE TOLD DEFENDANTS, LT. SAMBDMAN, LT. GORMAN, AND CLO FORD, TO GO TO "HELL" AND DO WHAT THEY HAVE TO DO CAUSE 5 AM. AT THAT TIME PLAINTIFF NOTICED THAT DEFENDANT, LT. SAMBDMAN, HAD PLAINTIFF, GRIEVANCES IN HIS HAND, RELATING THE APRIL 13, 2006 INCIDENTS . . .

94). PLAINTIFF ALLEGES THAT; DEFENDANT, LT. SAMBDMAN, SLIDE THE GRIEVANCES BACK UNDER PLAINTIFF, CELL DOOR, AND TRIED TO CONVINCE PLAINTIFF IN NOT FILING THOSE GRIEVANCES WITH HIS COUNSELOR. DEFENDANT, LT. SAMBDMAN, ALSO TRIED TO BRIBE PLAINTIFF, WITH A PROMISE TO GIVE PLAINTIFF A EXTRA FOOD TRAY AND TWO - CIGARETTE'S. WHICH PLAINTIFF DECLINED THE BRIBES . . .

95). PLAINTIFF ALLEGES THAT; HE SLIDE HIS GRIEVANCES BACK UNDER HIS CELL DOOR, AND YELLED OUT LOUD TO PUT MY GRIEVANCES BACK IN THE MAIL BAG, AND STOP TRYING TO BRIBE ME. THE PLAINTIFF DID THAT SO THAT OTHER PRISONER AND STAFF, COULD SEE AND HEAR WHAT WAS GOING ON . . .

96). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. SAMBDMAN, PICKED THE GRIEVANCES OFF OF THE FLOOR AND TOLD PLAINTIFF, THAT I WILL REGRET IT, AND WALKED OFF, AND PLACED GRIEVANCES BACK INTO THE MAIL BAG . . . AND DEFENDANTS, LT. GORMAN AND CLO FORD LEFT PLAINTIFF CELL FRONT . . .

97). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. SAMBMAN, LT. GORMAN, AND C/O FORD, SEEN THAT PLAINTIFF COULD NOT BE BRIBED, THATS WHEN DEFENDANTS, WENT AND WROTE PLAINTIFF, A DISCIPLINARY REPORTS, FOR UTILIZING THE GRIEVANCE PROCEDURE. . . .

98). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. SAMBMAN, LT. GORMAN, AND C/O FORD, WROTE AND FILED FALSE DISCIPLINARY CHARGES AGAINST PLAINTIFF, IN RETALIATION FOR PLAINTIFF UTILIZING THE GRIEVANCE PROCEDURE AND COMPLAINING TO OTHER PRISON'S OFFICIAL'S ABOUT THE APRIL 13 2006, INCIDENTS

99). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, AND McCANN, AND ALL UNKNOWN DEFENDANTS, FOUND PLAINTIFF GUILTY OF ALL CHARGES, ON RETALIATION, FOR THE PLAINTIFF UTILIZING THE GRIEVANCE PROCEDURE AND FOR PLAINTIFF, CONTINUING COMPLAINING TO PRISON'S OFFICIAL'S ABOUT THE APRIL 13, 2006 INCIDENTS

100). PLAINTIFF ALLEGES THAT; DEFENDANTS, HENRY, CHANDLER, SGT. WICKS, C/O GILLETTE, C/O LINDOLOM, C/O HESS, R/N SCHAVE, LT. MITCHELL, C/O HAMILTON, McCANN, AND ALL UNKNOWN DEFENDANTS, KNOW THAT THOSE DISCIPLINARY REPORTS, WERE FABRICATED AND DONE IN RETALIATION FOR PLAINTIFF, UTILIZING THE GRIEVANCE PROCEDURE AND COMPLAINING ABOUT THE APRIL 13 2006, INCIDENTS

(01). PLAINTIFF ALLEGES THAT; DEFENDANTS, HENRY, CHANDLER, MCCANN,
SGT. WICKS, C/O GILLETTE, C/O LINDBLOOM, C/O HESS, C/O HAMILTON,
LT. MITCHELL, AND ALL UNKNOWN DEFENDANTS, FAILED AND HAS REFUSED
TO INTERVENE IN THE RETALIATORY CONDUCTS, TAKEN AGAINST
PLAINTIFF, FOR UTILIZING THE GRIEVANCE PROCEDURE AND FOR
COMPLAINING TO PRISON'S OFFICIAL'S ABOUT THE APRIL 13, 2006
INCIDENTS

(02). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. SAMBOMAN, LT. GURMAN,
C/O FORD, RETALIATED AGAINST PLAINTIFF, FOR UTILIZING
THE GRIEVANCE PROCEDURE, AND FOR COMPLAINING ABOUT THE
APRIL 13 2006 INCIDENTS, AND TO COVER-UP THE APRIL 13 2006
INCIDENTS, TO MAKE IT SEEMS AS IF WHAT THEY DID WAS
JUSTIFIED

(03). PLAINTIFF ALLEGES THAT; FOR THE ACT'S DESCRIBED ABOVE
THE DEFENDANTS WHETHER KNOWN OR UNKNOWN, ALL RETALIATED
AGAINST PLAINTIFF FOR UTILIZING THE GRIEVANCE PROCEDURE
AND COMPLAINING TO PRISON OFFICIAL'S ABOUT THE APRIL 13 2006
INCIDENTS, AND IN ORDER TO COVER-UP THE APRIL 13 2006 INCIDENTS,
TO MAKE IT SEEM AS IF, THEY WERE JUSTIFIED FOR DOING WHAT
THEY DID TO PLAINTIFF, IN VIOLATION OF PLAINTIFF, FIRST
AND FOURTEENTH AMENDMENTS RIGHTS TO THE CONSTITUTIONS .

(04). PLAINTIFF ALLEGES THAT; THIS ACTION IS FILE AGAINST ALL
KNOWN AND UNKNOWN DEFENDANTS, WHO ARE RESPONSIBLE IN
DAMAGES

COUNT # 5
STATE TORT CLAIM FOR
ASSAULT AND BATTERY

105). PLAINTIFF, REALLEGES PARAGRAPHS (1-107). AS IF SET FORTH FULL HEREIN.

COUNT # 6

DECLARATORY RELIEF

106). PLAINTIFF, REALLEGES PARAGRAPHS (1-107). AS IF SET FORTH FULLY HEREIN.

THERE IS AN ACTUAL CONTROVERSY BETWEEN THE PARTIES REQUIRING THE COURT TO DECLARE THE RIGHTS, AND OTHER LEGAL RELATIONS OF THE PARTIES.

COUNT # 7

INJUNCTION RELIEF

107). PLAINTIFF, REALLEGES PARAGRAPHS (1-107). AS IF SET FORTH FULLY HEREIN.

UNLESS ENJOINED FROM DOING SO, DEFENDANTS WILL CONTINUE TO WILLFULLY VIOLATE THE RIGHTS OF PLAINTIFF. THESE CONTINUING VIOLATIONS CONSTITUTES IRREPARABLE INJURY FOR WHICH PLAINTIFF, HAVE NO ADEQUATE REMEDY AT LAW

WHEREFORE, PLAINTIFF, REQUEST THIS COURT TO GRANT THE FOLLOWING RELIEF.

A). DECLARE THAT THE ACTIONS AND INACTIONS OF DEFENDANTS DESCRIBED HEREIN HAVE VIOLATED AND CONTINUE TO VIOLATE THE PLAINTIFF, RIGHTS, UNDER THE FIRST, EIGHT, AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTIONS • • • •

B). ENJOIN DEFENDANTS FROM ENGAGING IN ANY ACTION OR CONDUCT, OR FAILING TO ACT IN ANY WAY, THAT VIOLATE THE PLAINTIFF CLEARLY ESTABLISHED CONSTITUTIONAL RIGHTS MENTIONED ABOVE • • • •

C). ORDER DEFENDANTS TO TAKE ALL ACTION NECESSARY TO REMEDY THE VIOLATIONS OF PLAINTIFF, CLEARLY ESTABLISHED STATUTORY AND UNITED STATES CONSTITUTIONAL RIGHTS, MENTIONED ABOVE • • •

D). ORDER DEFENDANTS, TO EXPUNGE ALL DISCIPLINARY REPORTS WRITTEN IN RETALIATION FOR PLAINTIFF UTILITYING THE GRIEVANCE PROCEDURE AND FOR COMPLAINING TO PRISONS OFFICIAL'S ABOUT THE APRIL 13, 2006 INCIDENTS, AND TRYING TO COVER-UP THE APRIL 13, 2006, INCIDENTS • • • OR TO GRANT A NEW HEARING SO THAT PLAINTIFF CAN PRESENT A DEFENSE • • •

E). AWARD PLAINTIFF, A JUDGMENT AGAINST DEFENDANTS SEPARATELY AND JOINTLY FOR COMPENSATORY DAMAGES IN THE AMOUNT OF FIFTY-ONE (\$ 51,000,000,00) MILLION DOLLARS • • •

F). AWARD PLAINTIFF, A JUDGMENT AGAINST DEFENDANTS, SEPARATELY AND JOINTLY FOR PUNITIVE DAMAGES, IN THE AMOUNT OF FIFTY-ONE (\$ 51,000,000,00) MILLION DOLLARS • • •

G). AWARD PLAINTIFF A JUDGMENT AGAINST DEFENDANTS, SEPARATELY AND JOINTLY FOR NOMINAL DAMAGES, IN THE AMOUNT OF FIFTY-ONE (\$ 51,000,000.00) MILLION DOLLARS, FOR PLAINTIFF EMOTIONAL MENTAL DISTRESS . . .

H). AWARD PLAINTIFF A JUDGMENT AGAINST DEFENDANTS, SEPARATELY AND JOINTLY FOR ATTORNEY'S FEES AND COSTS

I). AWARD PLAINTIFF A JUDGMENT AGAINST DEFENDANTS, SEPARATELY AND JOINTLY, FOR ANY OTHER RELIEF THAT THIS COURT OEMS JUST AND PROPER

RESPECTFULLY SUBMITTED
Christopher Knoll 361090

200 E. SUPERMAX, RD
TAMMS, ILLINOIS 62988

CERTIFICATE OF SERVICE

I, CHRISTOPHER KNOX, HEREBY CERTIFIES THAT A TRUE AND CORRECT 1-ORIGINAL AND 18 COPIES OF PLAINTIFF CIVIL RIGHTS COMPLAINT, HAS BEEN SERVED UPON . . .

To: Clerk of The Court
211 South Court, Federal Bld.
Rockford, Illinois 61101

BY CAUSING TO BE PLACED IN AN PREPAID ENVELOPE
DULY SWORN UPON OATH DEPOSES, COMPLAINT IN THE UNITED
STATES MAIL. ADDRESSED TO THE ABOVE NAMED PARTY.
AT THE ABOVE ADDRESS. IN TAMMS. ILLINOIS. ON 12 DAY OF
DECEMBER 2007. . .

Respectfully submitted

Christopher Knox B61090

200 E. SUPERMAX, rd
TAMMS. ILLINOIS 62988